

## Problematical Otherness: Defining and dealing with the Other in French and Dutch civic integration abroad policies

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### Introduction

Until recently, no country in Europe or elsewhere had imposed integration requirements on family migration, that is on the admission of foreigners who join a partner, parent or child. In 2005, the Dutch centre-right Balkenende government was the first to introduce such a requirement (Groenendijk, 2005, p.12). The French right-wing Fillon government followed suit in 2007.

The civic integration abroad programs introduced by the Dutch Law on Civic Integration Abroad and the French Law on Migration Control, Integration and Asylum<sup>1</sup> are broadly similar. They both require family migrants to familiarise themselves with the language and customs of the host society before being granted entry. In France as in the Netherlands, the introduction of civic integration abroad was a response to growing concern for the societal consequences of past and present migration flows. French and Dutch politicians perceived the process of migrant incorporation to be failing, to the extent that the cohesion of society as a whole was endangered and state intervention was necessary to restore the minimum conditions for society to function harmoniously. These conditions were apparently considered to include a certain degree of homogeneity in cultural values and skills among the population. Difference, or "Otherness", was perceived as a problem that required a policy solution.

In this paper, I seek to identify and account for differences and similarities in the framing of "Otherness" in the making of French and Dutch civic integration abroad policies. Relying on a constructivist approach to the study of policy-making (Schön & Rein, 1994; Hall, 1993; Hajer, 1989), my aim is to determine how problematic

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<sup>1</sup> *Loi No 2007-1631 du 20 novembre 2007 relative à la maîtrise de l'immigration, à l'intégration et à l'asile.*

Otherness is defined, i.e. what differences are believed to pose problems; which migrants or groups of migrants are perceived as problematically different; and finally, how this Otherness is dealt with through the modalities of French and Dutch civic integration abroad policies. To answer these questions, I have analysed parliamentary debates pertaining to civic integration abroad that took place in the Netherlands between June 2004 and April 2005 and in France between July and October 2007.

In academic literature, a well established approach to explain differences between countries' migrant policies refers to "national models", i.e. country-specific institutional and discursive traditions in the policy field of migration and integration (Brubaker, 1992; Castles, 1995; Favell, 1998; Entzinger, 2005; Koopmans *et al.*, 2005). In these works, the Netherlands is often represented as a typical example of a pluralist country where ethnic, cultural and religious differences are acknowledged and protected by the state, whereas France is considered the archetype of a universalist country where such differences are barred from the public and political realm. In other words, France and the Netherlands are ascribed with opposing ways of dealing with Otherness. The analytical validity and usefulness of "national models" have recently been subject to debate (Joppke, 2007; Jacobs & Rea, 2007). Throughout this chapter, I shall assess how and to what extent "national models" may be of value in understanding the differences between the constructions of the Other in Dutch and French civic integration abroad policies.

### **The legal definition of the target group**

Overall, the target group of civic integration abroad is very similar in the Netherlands and France. In both countries, civic integration abroad applies to non-EU nationals between sixteen and sixty-five years old who request entry for the purpose of uniting with a partner, parent or child. It extends not only to those who come to join a resident foreigner, but also to family members of nationals. In France, as in the Netherlands, the age criterion of sixteen years was chosen because compulsory education ends at sixteen<sup>2</sup>. Younger children are expected to learn the language and customs of their new country in school<sup>3</sup>. In the Netherlands, religious ministers, in addition to family migrants, are also obliged to learn about Dutch language and society before being granted entry due to the "exceptional societal function" they fulfil<sup>4</sup>.

Both countries have accorded exemptions to nationals from some of their former colonies. Thus, Algerian family migrants who request entry into France are not subjected to the civic integration abroad requirement. Their conditions of entry and stay are not determined by regular French immigration law, but by a bilateral agreement between Algeria and France. However, the French government has expressed its intention to renegotiate this agreement at a later date<sup>5</sup>. In the Netherlands, Surinamese nationals

<sup>2</sup> In the Netherlands, 16 year old foreigners who must attend school part-time are exempt from civic integration abroad.

<sup>3</sup> Assemblée Nationale (further: AN), *Rapport No 160*, 12 September 2007; Tweede Kamer (further: TK) 29700 (3): 7, 21 July 2004.

<sup>4</sup> TK 29543 (2): 10, 24 April 2004; cf. TK 29700 (6): 34, 6 December 2004.

<sup>5</sup> Sénat, plenary, 3 October 2007.

who can prove completion of at least primary school in Surinam – where Dutch is the official language – or in the Netherlands are exempted from civic integration abroad<sup>6</sup>.

Finally, but not insignificantly, the Dutch integration requirement at entry applies only to those family migrants who require a provisional residence permit<sup>7</sup> to enter the Netherlands. Nationals from Australia, Canada, Japan, New Zealand, the United States and – since 1 June 2007 – South Korea may enter without such a permit, therefore without fulfilling the integration requirement. The government argued that it would endanger Dutch “foreign and economic relations” with these countries to introduce obstacles to the entry of their citizens. Besides, the countries concerned “are comparable to European countries in cultural, socio-economic and societal respect” and their nationals “in general possess a certain insight into the societal relations we have in the Netherlands and into Dutch norms and values”<sup>8</sup>.

### Naming the problem and the problematic Other

In the classic “national models” approach, the Netherlands is represented as a pluralist country and France as a universalist country. Thus the Dutch perceive their nation as composed of minorities and the country’s public and political sphere as pluralistic. This pluralist tradition is relied on to explain why, in dealing with migrants, the Dutch state adopted a collective approach, identifying groups or communities mostly on the basis of national or ethnic origin as target groups of policy and recognising or protecting collective cultural and political rights (cf. Entzinger, 2003, p. 62-65; Koopmans *et al.*, 2005, p. 71). France, in contrast, defines itself as “one and indivisible”, a nation composed of individual citizens whose relation to the French state is not to be mediated by communities or organisations. The Republic is colour-blind. The ethnic, cultural or religious background of its citizens is irrelevant in its public sphere. This conception of equality among citizens of the Republic is seen to explain French aversion to state recognition of migrants’ collective identities or claims (cf. Viet, 1998, p. 419; Bertossi & Duyvendak, 2009, p. 31). To what extent have these “national models” shaped the content and outcome of French and Dutch parliamentary debates about civic integration abroad?

Politicians’ perceptions of the overall problem for which civic integration abroad is intended to solve are very similar in France and the Netherlands. They fear that, as a result of past and present immigration flows and failing immigrant integration, their societies are disintegrating into distinct, isolated, and even hostile groups. A French UMP deputy raised the spectre of “different cultures and ethnicities living together on the same territory while preserving their specificities, thus resulting in the formation of ghettos, the juxtaposition of antagonist blocs”<sup>9</sup>. In the Netherlands, the first Balkenende government stated that “differences in ethnic origin (...) trigger centrifugal forces in society and lead to the physical, social and mental separation of population groups”<sup>10</sup>. Ethnic and cultural diversity are seen to present a threat

<sup>6</sup> TK 29700 (27), 25 March 2005.

<sup>7</sup> “*machtiging tot voorlopig verblijf*”, commonly referred to as “*mvv*”.

<sup>8</sup> TK 27083 (45): 8-9, 24 June 2004; TK 29700 (6): 32, 6 December 2004.

<sup>9</sup> AN, *Amendement No 59*, 14 September 2007.

<sup>10</sup> TK 28375 (5): 15-16, 3 July 2002.

to the very cohesion of society. Migrants are considered both actors in and victims of the problem. On the one hand, they are the ones who are “pulling back into their community”<sup>11</sup> and “turning away from society and reverting to archaic norms and values”<sup>12</sup>. On the other hand, they are the ones to suffer from “marginalisation” and “isolation”<sup>13</sup>, as well as from being “locked up in communautarist schemes”<sup>14</sup>. Both socio-economic and socio-cultural aspects play a role in this problem perception. Indeed, the cause for concern is precisely the idea that socio-economic disadvantage in the labour market and in education and housing overlaps with ethnic and cultural difference, i.e. that socio-economic gaps and cultural cleavages are mutually reinforcing each other. When specifying the differences in values and customs they find problematic, politicians in France and the Netherlands refer first to matters related to gender, family and sexuality, including forced marriages, domestic violence, child rearing, polygamy and, in the Netherlands, homosexuality and second to issues regarding religion and church-state relations. It is in these respects that groups of migrant origin – and more particularly, though rarely explicitly mentioned, of Muslim faith – are deemed most worrisomely different from the host society.

However, French and Dutch politicians offer very different accounts when defining why family migration in particular presents a problem that requires policy intervention. The French government has only referred to the size of family migration flows – almost twice the size of student inflow and more than six times that of labour immigration – to illustrate why this particular type of migration should be subjected to an integration requirement<sup>15</sup>. French politicians presented the problem of family migration as purely quantitative in nature, not qualitative. The Dutch government on the other hand has elaborated at length on the problematic nature of family migration, not only in terms of size but also in terms of the type of migration. It stated that “the large scale immigration of the last ten years has seriously disrupted the integration of migrants at the group level. We must break out of the process of (family) migration which time and again causes integration to fall behind”. “Normally”, the government stated, each new generation with a migrant background would grow up to be better integrated than their parents. This progressive process however was obstructed “by the fact that a large number of second generation migrants opts for a marital partner from the country of origin”, thus continuously importing new first generation migrants<sup>16</sup>.

The Dutch government proceeded to explain which family migrants in particular were cause for concern and why. It argued that “an important part of these [family migrants] has characteristics that are adverse to a good integration into Dutch society. Most prominent among these – also in scale – is the group of marriage migrants from Turkey and Morocco”. More than half of second generation migrants of Turkish and Moroccan background married a partner from their parents’ country of origin. Of these Turkish and Moroccan marriage partners, only 60% and 41% respectively had

<sup>11</sup> AN, plenary, 10 February 2004.

<sup>12</sup> TK 29700 (6): 47, 6 December 2004.

<sup>13</sup> TK 27083 (44): 6 & 9, 21 June 2004; TK 28198 (5): 6, 4 October 2002.

<sup>14</sup> AN, plenary, 19 September 2007.

<sup>15</sup> AN, *Projet de loi No 57*, 4 July 2007.

<sup>16</sup> TK 29700 (3): 2-4, 21 July 2004; TK 29700 (6): 3, 6 December 2004.

completed more than primary education. Unemployment of this population was three times higher than the native population. In addition, the government indicated that these migrants had few contacts with Dutch people, were strongly oriented towards their own group, identity and culture, and held "traditional opinions regarding [women's] emancipation". Given these research findings, these family migrants were deemed unlikely to integrate successfully into Dutch society both in socio-economic and socio-cultural terms. Although the refugees' situation and that of their family members was somewhat less well documented, the government stated that the available data indicated that "follow-up migration" among refugees in the Netherlands was a cause for equal concern<sup>17</sup>.

Both the facts that such detailed information about the socio-economic position and socio-cultural attitudes of particular ethnic groups was available and that the government did not hesitate to present this data to support its policy proposal, are in line with the "national models" representation of the Netherlands as pluralist. In Dutch policies and research since the 1980s, it has been common practice to examine and address the needs of different migrant groups separately and explicitly (Scholten, 2007, p. 80-82). This contrasts with French practice, where reluctance to recognize particular group identities has led politicians to shy away from labelling immigrants as groups, both in discourse and in policy, and researchers from applying ethnic criteria in their studies (Amiraux & Simon, 2006). This "universalist" approach is clearly reflected in the debates about civic integration abroad. French government officials and parliamentarians speak about "immigrants" or "foreigners". References to specific nationalities or regions of origin are rare and data about particular immigrant groups are absent.

Thus, the pluralist and universalist "models" are clearly identifiable in the ways in which Dutch and French politicians present family migration as a policy problem. Whereas the Dutch explicitly and extensively argue why they consider the inflow of particular groups of family migrants highly problematic, the French discourse remains much more abstract and general, referring only to the size of inflows, not to characteristics or categories of family migrants.

However, one episode in the French parliamentary debate reveals that the French government's perception of "problematic" family migrants was very similar to the Dutch government's perception. In the Senate, the submission of foreign spouses of French nationals to the integration abroad requirement was cause for lengthy debates. The Commission which prepared the plenary debates unanimously adopted an amendment eliminating this requirement. It argued that spouses of French citizens should benefit from a "presumption of integration" and that they would learn the language much more effectively in France with their French partner<sup>18</sup>. In the Commission meeting, Socialist as well as UMP Senators declared that reunification with a foreign resident and reunification with a French spouse were distinct cases which should be subjected to different regulations<sup>19</sup>. Thus pressured to defend his

<sup>17</sup> TK 29700 (3): 4, 21 July 2004; TK 29700 (6): 3, 5, 14-16, 6 December 2004.

<sup>18</sup> Sénat, *Rapport No 470*, 26 September 2007.

<sup>19</sup> Sénat, *Commission des lois*, 26 September 2007.

proposal, Minister Hortefeux reverted to an extremely rare explicit reference to the regions of origin of family migrants. He emphasised that, while the Senators seemed to have spouses from Australia or Canada in mind, in fact 43,000 out of a total 60,000 spouses of French citizens came from Africa, 12,000 of which from Sub-Saharan Africa. Hence, Hortefeux declared that application of civic integration abroad to these marriage migrants "indeed seems necessary to us"<sup>20</sup>. The government proposal was saved by an amendment put forward by UMP Senator Del Picchia, exempting the foreign spouse of a French citizen residing abroad and wishing to return to France for professional reasons, from fulfilling the integration requirement. The Senator gave the example of a "young French executive sent abroad, who marries a local national" and who "wishes to return to France for professional reasons shortly after his marriage". In such a case, the spouse should be "entirely exempted from the formalities of the test and course abroad". This amendment solved the problem for the right-wing majority in the Senate and the integration abroad criterion for foreign spouses of French nationals was reintroduced. Arguments from the Socialists that "the marriage to a French citizen is, in itself, a sign of a will to integrate with regard both to language and to the Republican values" were of no avail<sup>21</sup>.

Thus, it seems that the French government and right-wing Senators had two distinct cases in mind: that of a French expatriate, probably well-educated and professionally successful, meeting a partner abroad on the one hand, and that of a French citizen, probably of African background, marrying a partner from his country of origin on the other hand. It was the latter type of family migration which was considered problematic, not the first. The Socialist Senators were quick to point out that "the target of this bill is (...) the marriage of a young French man or woman whose family is of foreign origin with a foreigner from his or her parents' country of origin"<sup>22</sup>. The French supporters of civic integration abroad then, like the Dutch government, considered chain migration through marriage with French residents of migrant background as the problem that the integration requirement was intended to alleviate.

Thus, it appears from our analysis thus far that "national models" have influenced the form of the debates in France and the Netherlands much more than its underlying purport and outcome. Explicit reference by the Dutch to the ethnic groups that civic integration abroad aimed to target and French reticence to do the same certainly reflect deeply rooted discursive and institutional structures which are country-specific. "National models" decisively shaped the limits of what politicians deemed proper to express and the lines of argument that they chose to use. Underlying these very different ways of naming the problem however was a highly similar definition of the group that politicians aimed to target, that is of the group that was considered to pose a problem.

<sup>20</sup> Sénat, plenary, 2 October 2007.

<sup>21</sup> Sénat, plenary, 3 October 2007.

<sup>22</sup> Sénat, plenary, 3 October 2007.



### Dealing with Otherness<sup>23</sup>

French and Dutch modalities of civic integration abroad programs are crucially different even though their perception of the societal "problem" that civic integration abroad was designed to alleviate was very similar as were the legal definition of the target group and the underlying perception of which family migrants posed problem.

In France, family migrants are obliged to participate in an evaluation of their knowledge of the French language and Republican values. Should this knowledge prove insufficient, they must attend a course before being granted entry into France. The courses are organised free of charge by a governmental agency. Admission is conditional on satisfactory participation in the evaluation and course not on achieving a certain result. In contrast, the Netherlands requires family migrants to prove basic knowledge of Dutch language and society by passing a test before granting them admission. The Dutch government does not provide the courses or learning material. However, it has compiled a practice pack available for 63.90€ including a film, a picture booklet about Dutch society, an exhaustive list of questions that may arise during the knowledge of society test, and a set of mock language tests. Applicants are charged 350€ each time they take the exam. In other words, the Dutch civic integration abroad policy is much more stringent than the French.

This difference is related to civic integration abroad objectives. In both countries, the government has indicated that the primary purpose was to improve the overall integration process of family migrants by ensuring that they entered the country well-prepared. From there however, the objectives diverged significantly. In the eyes of the Dutch government, civic integration abroad was to ensure at the earliest possible stage, that both the migrant and his or her family member in the Netherlands were aware of their responsibility for the integration of the newcomer into Dutch society and of the active efforts that were expected of them<sup>24</sup>. Moreover, the government explicitly presented its civic integration abroad criterion as a "selection mechanism". The criterion would select migrants based not on education, income or origin as this would infringe on the right to family life guaranteed by the European Convention on Human Rights, but based on "motivation and perseverance". Since the government would not assist applicants in preparing for the exam, a substantial investment of time and resources would be required of them. This was deemed not only acceptable but even recommendable since appealing to the "personal responsibility" of the persons concerned would "yield the best results"<sup>25</sup>. Moreover, "the foreigner might also face difficulties in the integration process after arrival in the Netherlands which it will be up to him to overcome"<sup>26</sup>. Those unable to attain the required level of knowledge through their own means while abroad were expected to "experience serious problems integrating once in the Netherlands" and would therefore "not be granted permission to settle in the Netherlands". Although reduction of immigration was "not a primary

<sup>23</sup> This section is partly based on an article that I am writing in collaboration with Doutje Lettinga to whom I am indebted for fruitful exchange and inspiring ideas.

<sup>24</sup> TK 29700 (3): 5-6, 21 July 2004; TK 29700 plenary: 4002, 22 March 2005.

<sup>25</sup> TK 27083 (44): 24, 21 June 2004.

<sup>26</sup> TK 29700 (3): 13-14, 21 July 2004.

goal”<sup>27</sup>, an expected “side-effect” of the new integration requirement was a decrease in family migration flows by an estimated 25%<sup>28</sup>. The government welcomed this prospect. “A reduction of the inflow of migrants whose integration into Dutch society can be expected to lag behind will alleviate the problem of integration”<sup>29</sup>.

The French government on the other hand emphatically presented the evaluation and courses abroad as a service offered to family migrants by the state for their benefit as an “additional means given to strangers who wish to settle in France to prepare their integration”<sup>30</sup>. The UMP rapporteur explicitly stated that “our objective is not to limit family reunification”<sup>31</sup>. The fact that there would be an obligation of effort, not of result, and that the courses would be offered for free, underpinned this presentation of civic integration as an integration provision rather than as a measure to control immigration.

Thus, we observe that while problematic Otherness was defined in very similar terms in France and in the Netherlands, the French and the Dutch opted for very different ways of dealing with this Otherness through civic integration abroad. A first explanation for this difference lies in the judicial constraints that weigh upon family migration policies in these two countries. In France, the “right to a normal family life” is considered a “*principe général du droit*”, the equivalent of a constitutional right, protected as such by the Constitutional Council (GISTI, 2002). This constitutional protection played a significant role in the parliamentary debates. In particular, members of the governmental majority in the *Assemblée Nationale* presented amendments that would have made the French civic integration abroad policy much more similar to the Dutch. Two UMP deputies proposed that admission be made conditional on passing the test rather than on mere participation in the evaluation and the course<sup>32</sup>. Two other amendments were submitted by the UMP to the effect of charging applicants for the costs of the evaluation and course, possibly to be refunded after satisfactory participation<sup>33</sup>. The government however advised against the adoption of these amendments, with regret, as “the Constitutional Council would most certainly censor a provision that would thus infringe upon the right to family reunification”. All four amendments were withdrawn<sup>34</sup>.

In the Netherlands, no such constitutional protection exists. The Dutch courts, in family reunification cases, refer to Article 8 of the European Convention on Human Rights, which guarantees the right to family life. Article 8, as interpreted by the European Court of Human Rights in Strasbourg, does not grant a right to family reunification. However, it does oblige states to strike a fair balance between the interest

<sup>27</sup> TK 29700 (6): 43, 6 December 2004.

<sup>28</sup> TK 29700 (3): 14-15, 21 July 2004.

<sup>29</sup> TK 29700 (3): 6, 21 July 2004.

<sup>30</sup> Sénat, plenary, 3 October 2007; cf. AN, plenary, 18 September 2007.

<sup>31</sup> AN, plenary, 19 September 2007.

<sup>32</sup> AN, *Amendement No 64*, 14 September 2007; AN, *Amendement No 84*, 17 September 2007.

<sup>33</sup> AN, *Amendement No 70*, 17 September 2007; AN, *Amendement No 83*, 17 September 2007.

<sup>34</sup> AN, plenary, 19 September 2007.



of individuals in living with their family and the general interest of the host society. Thus far, the Court has granted states quite some leeway in defining and protecting this general interest (Van Walsum, 2004). The French Constitutional Council has a stricter interpretation of the obligations imposed on the state by the right to family life. Thus, the right to family reunification, although by no means absolute, enjoys a higher standard of protection under the jurisprudence of the French Constitutional Council than under the Court in Strasbourg (Labayle, 2007, p. 105-106, 111, 114). Therefore, the possibilities for the French government to impose obstacles to family migration were more limited than the Dutch.

Beyond these distinct judicial constraints however, I discern patterns in the ways of speaking about civic integration abroad and its intended purposes, as well as in the policy choices that have been made which appear to have been shaped by "national models" of migrant integration. This may seem surprising at first sight. Indeed, the classic "national models" approach appears wholly inadequate to explain the fact that "multicultural" Netherlands has implemented a civic integration abroad policy that exerts more pressure on family migrants to adapt to Dutch language and customs than "assimilationist" France. To Joppke (2007, p. 2), current Dutch civic integration policy provides significant ammunition to his argument that "the notion of national models no longer makes sense, if it ever did". While acknowledging that the notions of "multiculturalism" and "assimilationism" as defined by Castles (1995) yield little insight into the difference between Dutch and French civic integration abroad programs, I hold that country-specific discursive and institutional structures have in fact informed the decision-making process and shaped its outcomes.

In France, the government considered the French language "an essential component of national identity and a vector of adhesion" and knowledge of Republican values "in itself a guarantee of integration"<sup>35</sup>. This reveals a belief in the universal attraction exercised by French culture and values, a belief wholly shared by parliamentarians from the Left to the Right which Brubaker (1992, p. 11) labelled "messianic universalism" and traced back to the Revolution and Napoleonic expansion. This explains in part why the French opted for an obligation of effort through their requirement to participate in a course rather than an obligation of result requiring successful completion of an exam. It was thought sufficient to put immigrants in contact with French language and values in order to arouse their adhesion. Furthermore, the active role adopted by the French state in organising and financing the courses reflects the strong social engineering role accorded to the state and its institutions in disseminating the values of French citizenship, of which the "internal *mission civilisatrice* carried out by the Third Republic's army of school teachers" (Brubaker, 1992, p. 11) is a classic historical example. Finally, the reticence of French politicians to refer to specific ethnic or national groups of family migrants completes the picture of a country which is confident that any foreigner, regardless of her background, can be educated by Republican institutions to be a French citizen. In this "model" of dealing with Otherness, where citizenship is a state of mind or

<sup>35</sup> AN, *Projet de loi No 57*, 4 July 2007.

practice based on shared universal values which can be acquired, it makes sense to design civic integration abroad as a tool to improve integration, not to bar entry.

In contrast, in the Netherlands, politicians make constant explicit reference to particular ethnic groups of family migrants, providing detailed statistics about their socio-economic and socio-cultural integration. This reflects an approach which Rath (1991) has called "minorisation": a process in which migrants are constructed as "problem groups" by politicians and researchers. Minorisation revolves around "non-conformity". Migrants are "represented as people with a way of life and mentality which deviates from the Dutch norm". This non-conformity is considered to be problematic because it is associated with a weak socio-economic position (p. 112). Rath argues that "minorisation is a characteristic of Dutch social history" (p. 131). It goes back at least to the second half of the 19<sup>th</sup> century when so-called "asocials" were subjected to intensive state care and re-education. Like the migrants in later times, these members of the Dutch lower class were "problematised because of their socio-cultural 'deviations', in so far as these might affect their participation in society" (p. 132-143). Ghorashi (2006, p. 8-17) builds on Rath's analysis by identifying "categorical thinking" as a crucial characteristic of the Dutch approach to migrant integration from the 1960s until today. This "categorical thinking" entails an essentialist conception of culture – where culture is considered an immutable characteristic of people instead of an ever-changing social construct. Gorashi traces this back to pillarisation when most realms of Dutch society were strictly divided into a catholic, protestant, socialist and liberal pillar. Pillarisation has left the Netherlands with a legacy of thinking in terms of immutable dichotomy between "Us" and "Them" which makes it "seem almost impossible to detach the individual migrant from his/her cultural and/or ethnic category". Like Rath, Ghorashi argues that cultural difference has been considered problematic because it has been associated with – and in her view even seen to cause – a disadvantaged position in the labour market and the education and housing sectors. Thus, the Netherlands has a tradition of approaching migrants as "groups", even "problem groups", where the socio-cultural properties of the members of an immigrant group are thought to be essential and unchangeable and are thought to determine their chances for improving their socio-economic position in society. This conception of belonging sheds light on the decision to use Dutch civic integration abroad policies as a "selection mechanism". While in France citizenship is seen as a property that can be acquired, in the Netherlands the properties of individuals tend to be seen as determined by their membership of a specific group. Since the Dutch do not share the French confidence in the capacity of state institutions to "create" citizens, they are inclined to regard group differences as lasting and irremediable. If difference is thus considered "sticky", it makes sense to strive to keep out those believed to be problematically different. This would explain why the Dutch civic integration abroad program is designed to deny entry to those unable or unwilling to adapt to the Dutch ways.

### Conclusion

In recent years, both the Netherlands and France have implemented highly innovative policy reform. They have introduced integration requirements at entry

for family migrants. French and Dutch civic integration abroad programs have been designed to solve a problem defined in very similar terms: the disintegration of society into antagonistic groups due to past and present migration flows and failing migrant incorporation. Frequent references during parliamentary debates on issues related to gender, sexuality and family as well as church-state relations, reveal that the Muslim population is found to be the most problematically different.

The legal definition of the target group of civic integration abroad is very similar in France and the Netherlands. Family migrants between 16 and 65 years old are subject to the integration requirement. However, the rationale of these two governments for targeting family migration, i.e. the construction of the family migrant as the problematic Other, is very different, at least in form. While the French government points only to the size of family migration flows and avoids reference to characteristics of family migrants or their region of origin, the Dutch government emphatically presents family migration as problematic both in quantitative and qualitative terms, painting a bleak picture of chain migration which causes marginalisation to be reproduced from one generation to the other, especially in the case of marriage migrants from Turkey and Morocco. This fits with the tendency, well documented in the "national models" literature, of the French to disregard the cultural, ethnic or religious background of migrants as irrelevant, and of the Dutch to acknowledge ethnic and cultural belongings and to define policy target groups along such criteria. However, beyond the form, i.e. beyond the terms and arguments employed in political debates, this analysis has shown that "problematic" family migration was in fact defined quite similarly in France and in the Netherlands. The "problem" is migration resulting from second or third generation migrants marrying partners from their (grand)parents' country of origin, especially when they originate from Turkey, the Maghreb, Sub-Saharan Africa, or similar parts of the world.

Thus, "national models" appear to have had little influence on the way in which the Other was defined in the debates about civic integration abroad. However, they have partially shaped the distinct ways in which France and the Netherlands have dealt with this Otherness through civic integration abroad. While the French program was presented as a service provided to immigrants to improve their integration, the Dutch program was designed to work as a "selection mechanism". This difference should be partly considered the result of different judicial constraints, i.e. the protection of the right to family reunification by the French Constitutional Council, a constitutional protection which is absent in the Netherlands. In addition, I argue that historically rooted conceptions of citizenship and belonging have played a role. In France, "Otherness" is thought of as remediable. There is faith in the capacity of the Republic to transform a foreigner into a citizen. Hence the obligation to participate in the evaluation and course and not to pass a test, i.e. shaping civic integration abroad as an integration provision, not a tool of migration control. In contrast, migrants in the Netherlands are considered members of a group, permanently endowed with the characteristics of that group. Since Otherness is almost irremediable, those who are problematically Other should be kept out. Hence the obligation of result and the use of civic integration abroad as a selective migration tool.

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"National models" in their classic definition offered by Castles (1995), i.e. multiculturalism in the Netherlands and assimilationism in France, yield little insight in the differences between the French and Dutch civic integration abroad programs. However, Joppke (2007) seems to throw away the baby with the bath water when he states that "national models" have lost their value as analytical tools. Incorporating country specific discursive and institutional structures in our analysis remains essential if we are to understand why different countries deal with Otherness in different ways.

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